Convoy Solutions, LLC (Proudly delivering IdleAir service)
629 North Broadway
Knoxville, TN 37917

Phone (865) 232-1700
Fax (865) 232-1699
www.idleair.com

August 12th, 2016

Daphne McMurrer
Guy Hoffman
TCEQ Air Quality Planning
MC-206,
P.O. Box 13087
Austin, TX 78711-3087

Re: Informal comments on the Emissions Banking and Trading (EBT) rules in 30 Texas Administrative Code Chapter 101, Subchapter H, Divisions 1 and 4.

Dear Messrs. McMurrer and Hoffman:

IdleAir appreciates this opportunity to share informal comments on the Emissions Banking and Trading (EBT) rule amendments. An EBT program provides market driven solutions to implement the most cost effective emissions reduction actions. We applaud TCEQ's efforts to further develop and implement a program with diverse stakeholder involvement.

IdleAir works with truck stops across the country to install Truck Stop Electrification (TSE) systems, providing long-haul truck drivers with an alternative to overnight idling by supplying hot/cold air, electricity, TV and internet to the window of a parked truck. These systems, already approved by EPA as a SmartWay verified technology, are beneficial to stakeholders on multiple fronts because they help reduce wasted fuel and the emissions associated with rest-period idling at these locations. According to estimates by the Argonne National Laboratory, rest-period idling wastes about 1 billion gallons of diesel and results in the emission of about 55,000 tons of nitrogen oxides (NOx) released annually in the U.S., in addition to VOC and greenhouse gas emissions.[1]

Because most truck drivers idle their engines during overnight stays in order to maintain a safe and comfortable interior environment, Texas represents a large portion of rest-period idling. Hours of Service rules require all Class 8 drivers to take a stationary rest for 10 hours every day after no more than 14 hours of work (made up of no more than 11 hours of driving and a maximum of 3 hours of additional non-driving work). Since drivers are confined to a sleeper berth in the rear of the cab, they are obliged to seek interior comfort by idling their engine when alternatives to idling are not available. This dynamic creates a significant amount of unmet demand for TSE services such as IdleAir.

Idling emissions from mobile sources such as trucks and buses are similar in nature to those seen for ships and barges that create idling emissions when performing loading operations at ports across the Texas Gulf Coast. These types of emissions can be controlled in cost effective ways by using innovative approaches and technologies, such as those provided by IdleAir, and other companies.

The basic economic and environmental proposition for IdleAir is simple - 1.5 kW/hr. hotel load of HVAC centric services can offset a full gallon of typical idling diesel waste per hour. The American Carbon Registry recognizes IdleAir's approximate net GHG mitigation of approximately 20 lbs of CO_2 for every hour of IdleAir usage, a greater than 90% reduction in GHGs net of grid-related emissions used to power IdleAir.

[1] See http://www.afdc.energy.gov/uploads/publication/hdv_idling_2015.pdf. Accessed August 3, 2016.

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Even if IdleAir were using grid power generated exclusively from coal-fired combined cycle power plants, our GHG reduction would still be over 75%, compared to an idling 500 hp diesel engine. Local NOx, SOx, and $PM_{2.5}$ emissions drop more than 95% when stationary electric air conditioners replace a roaring diesel truck engine running at idle speeds. Because TSE also offsets VOC emissions on site, there are immediate reductions in ground-level ozone formation that would otherwise impact vulnerable populations living near these facilities.

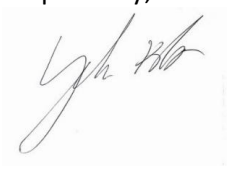
The US Department of Transportation, through the Federal Highway Administration[2], as well as EPA[3], separately rate truck stop electrification as a highly cost effective solution to mitigate criteria pollutants like NOx emissions. Texas is IdleAir's largest market and presents our largest opportunity for growth. This is due to generally hot weather, expansive interstates with heavy truck traffic, and busy border crossings. IdleAir's 15 Texas locations are responsible for roughly half of our national network utilization.

IdleAir understands and respects the TCEQ's concern for emission representations in the SIP for these types of activities, in addition to other concerns. IdleAir urges the TCEQ to approach such emission reduction projects pragmatically when determining eligibility and applying discounts. Verifiable utility records and emission estimations, and the resulting emission reductions can be well documented, and made enforceable by operator agreements and certified permit conditions to satisfy TCEQ concerns.

The EBT program, by allowing for such emission reductions to be certifiable, helps create the economic incentive needed for widespread implementation of these types of projects. Allowing Truck Stop Electrification projects to participate in the EBT program, and keeping the discount to fair and acceptable levels, will achieve a greater environmental return at a faster rate. This is especially critical in areas where improvement is needed most, since truck stops and fleet terminals tend to be located near disadvantaged communities.[4]

The EBT program represents a promising opportunity for industries to invest in low hanging fruit technologies like TSE in a manner that costs less money to achieve a greater environmental return. The trade also delivers air quality improvements where they are needed the most. We invite any opportunity for a follow-up discussion. Should you have any questions, please feel free to contact me at yale.klat@idleair.com or (646) 481-6684.

Respectfully,



Yale Klat
Director, IdleAir Government Relations

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[2] National Research Council (U.S.) Committee for the Evaluation of the Congestion Mitigation and Air Quality Improvement Program. *The Congestion Mitigation and Air Quality Improvement Program: Assessing 10 years of Experience / Committee for the Evaluation of the Congestion Mitigation and Air Quality Improvement Program*. Available at http://onlinepubs.trb.org/onlinepubs/sr/sr264.pdf. Accessed July 6, 2016.
See also. United States Department of Transportation. *Congestion Mitigation and Air Quality (CMAQ) Improvement Program - Cost Effectiveness Tables Development and Methodology.* Accessed July 13, 2016. Available at http://www.fhwa.dot.gov/environment/air_quality/cmaq/reference/cost_effectiveness_tables/report/costeffreport.pdf.

[3] Available at https://www3.epa.gov/otaq/stateresources/policy/general/420b07006.pdf. Accessed August 5, 2016.

[4] Populations within 1.5 miles of IdleAir's 15 Texas locations represent 65% more minorities and have per capita income 24% lower than the statewide average. See http://www.idleair.com/tse-environmental-justice/